REMARKS

This responds to the Office Action dated October 16, 2006.

In the Office Action, claims 1 and 18-81 are noted as pending in the application, claims 1 and 18-81 stand rejected, no claims are objected to and no claims are allowed. No claims have been withdrawn from consideration.

Status of Claims

Claims 1 and 18-81 are pending in the application and are rejected. No claims are canceled, no claims are amended and no claims are added. All claims 1 and 18-81 remain pending in the application.

Rejections

Claims 1, 18-40, 42-63, 65-79 and 81 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Hassan et al.* (US Patent No. 5,550,646) in view of *Shiohara* (US Patent No. 6,618,553). Claims 41, 64 and 80 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Hassan et al.* in view of *Shiohara* as applied to claims 20, 35, 49, 59 and 66 above, and further in view of *Yamakita* (US Patent No. 6,366,698).

Applicant respectfully traverses the foregoing rejections. Applicant will discuss first Applicant's disclosure. The following discussion will also demonstrate that the references cannot be combined to teach or suggest the claimed combinations.

Applicant's Disclosure

Applicant teaches a fax phone including a housing 26 and a communications interface such as a telephone line connection or jack 42 for communicating analog and/or color digital signals between the fax phone and a remote system (not shown) such as a phone utility company or other communications service. The jack 42 may receive a conventional modular plug for a telephone cable or other communications interface. The fax phone may also include a data entry assembly, which may include a

conventional keypad 46, a print key 68 and/or other data entry keys. The fax phone may also include a display 72.

The fax phone also preferably includes one or more image data interfaces 74 for receiving image data from a camera 76 or other image source. In one preferred embodiment, the camera is a digital camera having a memory module such as a flash disk module 78, and the data interface 74 on the fax phone 20 is preferably complementary to and configured to accept the flash disk module 78 (Specification, page 8, line 27) so that the image data on the module 78 can be received from the module 74 and transferred to a processor 56 in the fax phone. The interface 74 can also be a removable cable connection to the camera 76 for transferring image data from the camera to the processor 56 (Specification, page 8, line 34), and other forms of the interfaces 74 may include an infrared receiver and/or transmitter. (Specification, page 9, line 4).

Cited Prior Art

Consider now several of the references relied upon by the Examiner. *Hassan* teaches an image communication system 110 and method using a camera to capture an image. It includes apparatus for generating a digital representation of an image, including a camera lens 201, combined with apparatus to fax the digital representation to a remote fax machine 140 using a telephone communication link 130. The fax machine 140 appears to be a conventional fax machine. The apparatus 110 can also include a miniature printer, for printing on thermal paper. According to *Hassan*, a color image can be converted to a representation that can be transmitted to a color facsimile machine [Column 6, Line 65 to Column 7, Line 2]. *Hassan* is no more than a camera combined with a fax modem, and the only teaching in *Hassan* is that images can be faxed from the camera over telephone lines to another fax machine. Telephone lines separate *Hassan* from all other fax machines. It does not print color images, it does not receive images from another device, let alone from a camera memory module, it does not print on separate sheets and it does not accommodate six-inch wide paper, to name

some examples. Moreover, *Hassan* teaches nothing about communicating image data other than through a fax modem over telephone lines.

It is noted at this point that the entire rejection of all claims cannot be supported because the Examiner points to two completely different apparatus in *Hassan* in support of a single rejection of an apparatus. Specifically, the Examiner points to the camera 110 for some parts of the apparatus, and then points to the fax machine 140 for other parts of the same apparatus. The Examiner makes no showing as to why any elements of the camera can be combined with the fax machine, or *vice versa*. The Examiner then mixes elements of the facsimile machine 140 and with elements of the camera assembly 110 to say that *Hassan* teaches all of the claimed apparatus but JPEG compression. The fact that the Examiner must take parts from two completely different apparatus to make the rejection establishes that the rejections cannot be supported.

It is suggested that Examiner choose either the facsimile machine 140 or the camera assembly 110 for the rejections. Jumping back and forth between the facsimile machine 140 and the camera assembly 110 shows clearly that the rejections cannot be supported. The Examiner cannot in one part of the rejection say that the facsimile machine 140 lacks a lens when receiving an image and in another part of the rejection say that the very same housing with data entry elements on a hand-accessible surface is the housing of the camera 110. The inconsistency in the Examiner's arguments establishes that the rejections cannot be supported. Therefore, because all claims are rejected based on this improper reliance on two different devices in *Hassan*, all claims should be allowable without more.

Shiohara teaches a digital camera and printing system having a digital camera 100. A photographed image 31 is displayed on a liquid crystal display and the user selects a desired image and specifies print specifications, such as the number of print sheets, print size, color mode, and the like. The image is transmitted from the camera to a color printer, to a modem such as for facsimile transmission, or to a personal computer. The image data can be compressed into a JPEG format. The Examiner cites *Shiohara* for a digital camera connecting to a fax printing system wherein data in the camera is compressed in JPEG format. However, *Shiohara* does not teach a "fax

printing system", but instead a conventional computer, a stand-alone printer connected to the PC, or a facsimile machine. According to *Shiohara*, "the external system contains a printer or a facsimile or an image processing system connected by a communication line. The Examiner's citations to column 1, lines 22-30, column 4, lines 15-33 and column 5, lines 31-38, do not support a proposition that *Shiohara* teaches or suggests a "fax printing system".

In any case, *Shiohara* does not provide any of the elements missing from *Hassan* other than JPEG compression. *Shiohara* does not teach or suggest acquiring image data without a lens, both sending and receiving data, receiving image data from a camera memory module, for example external to a housing, or other components missing from *Hassan*.

In view of the foregoing, any possible combination of *Hassan* and *Shiohara* would not lead to Applicant's inventions. Additionally, nothing in *Shiohara* supplies any of the elements missing from *Hassan* other than JPEG data compression.

Claims

Consider now the claims in the application. Claim 1 is an independent apparatus claim and recites in part:

> "a housing;
>
> a data entry element on a hand-accessible surface of the housing for entering a destination for signals representing an image;
>
> . . .
>
> "a connection adjacent the housing for receiving JPEG data from a camera storage element; and
>
> "wherein the apparatus omits any lens for receiving light representing an image to be recorded."

None of the cited references taken singly or in combination teach or suggest the claimed combination, the recited elements quoted above, or "the apparatus omits any lens for receiving light representing an image to be recorded". Both references are

cameras with lenses, and fail to teach or suggest the claimed combination. It is noted that the Examiner argues that the apparatus omits any lens for receiving light to be recorded "when receiving data from the camera 110". As noted above, it appears that the Examiner mixes up the apparatus in the rejection between the facsimile machine 140 and the camera assembly 110. It is suggested that Examiner choose either the facsimile machine 140 or the camera assembly 110 for the rejections. Jumping back and forth between the facsimile machine 140 and the camera assembly 110 necessarily makes the rejections unsupportable. The inconsistency in the reasons for the rejections shows clearly that the rejections cannot be supported. The Examiner cannot in one part of the rejection say that the facsimile machine 140 lacks a lens when receiving an image and in another part of the rejection say that the housing with data entry elements on a hand-accessible surface is the housing of the camera 110. The inconsistency in the Examiner's arguments establishes that this rejection (as well as the others) cannot be supported.

Claim 18 is an independent apparatus claim and recites in part:

"a connection for receiving JPEG data from a camera storage element;

"memory for storing signals representing an image;

"an interface jack between the housing and a communications line for transmitting signals from and receiving signals in the housing representing images;

"conversion means for converting signals representing an image into data for controlling a printer for printing an image onto the paper; and

"a printer in the housing for printing an image onto the paper."

None of the cited references taken singly or in combination teach or suggest the claimed combination, the recited elements quoted above, or "an interface jack between the housing and a communications line for transmitting signals from and receiving signals in the housing representing images". There is no teaching or suggestion that

any of the references receives image data, or receives image data over an interface connection. *Hassan*'s camera 110 only sends image data.

Claim 19 is an independent apparatus claim and recites in part:

"means within the housing for printing the image onto a medium;

"removable means for removably holding a plurality of sheets of the medium;

"connecting means associated with the housing for receiving JPEG data from a camera storage element;

"means within the housing for storing signals representing an image;

"means for transmitting signals from and receiving signals in the housing representing images; and

"means for converting signals representing an image into data for controlling a printer for printing an image onto the paper.

None of the cited references taken singly or in combination teach or suggest the claimed combination, the recited elements quoted above, "connecting means associated with the housing for receiving JPEG data from a camera storage element" or "means for transmitting signals from and receiving signals in the housing representing images". The Examiner has made no showing that either of the references meets the structures or functions of the claimed means elements or the combination of elements set forth in claim 19. As noted, neither reference teaches or suggests receiving images or receiving images from a camera storage element through connecting means associated with the housing. Clearly claim 19 is patentable over the references.

Claim 20 is an independent apparatus claim and recites in part:

"a connection adjacent the housing for receiving JPEG data from a camera storage element;

"means for receiving and sending digital image files; and

"wherein the receiving and sending means includes a color fax modem."

None of the cited references taken singly or in combination teach or suggest the claimed combination, the recited elements quoted above, "a connection adjacent the housing for receiving JPEG data from a camera storage element", "means for receiving and sending digital image files" or "wherein the receiving and sending means includes a color fax modem". Neither of the references teach or suggest any type of connection adjacent a housing for receiving JPEG data from a camera storage element. None of the references teach or suggest means for receiving and sending digital image files. The Examiner cites element 219 in *Hassan*, but the fax interface 219 in *Hassan* does not both receive and send image files. As shown in FIG. 2, the fax interface 219 of *Hassan* only sends image data to the telephone network, as indicated by the one-directional arrow. Moreover, the Examiner does not establish any evidence that *Hassan* teaches any elements meeting any structures or functions defined by the means element. Furthermore, none of the references teach or suggest any receiving and sending means including a color fax modem. While *Hassan* mentions possible color facsimile processing, no color images are received by the apparatus. Clearly claim 20 is patentable over the references.

The claims 21-43 are dependent directly or indirectly from independent claim 20 and are asserted as being patentable for the same reasons as discussed above with respect to claim 20, for the additional combinations in the dependent claims as well as for the additional limitations recited in the dependent claims. Note for example claim 22 reciting in part "an interface between the housing and a communications line for transmitting signals from and receiving signals in the housing representing images". Note also claim 27 reciting in part "a color printer for retrieving a sheet of paper from the paper cartridge and printing a color image on the paper". Additionally, claim 28 recites in part "the printer is sized to accept paper larger than six inches wide". Claim 33 recites "further including means for controlling the indicator to produce flashing light". Claim 34 recites "further comprising means for printing an image on the medium and a print button for causing the printing means to print on the paper and wherein the indicator is on the print button". Claim 35 recites in part "wherein the connection for

receiving JPEG data is configured so that the JPEG data can be received from outside the housing". Claim 37 recites "wherein the connection is adapted for receiving a camera memory module". Claim 40 recites "wherein the connection is adapted for receiving a cable from a digital camera". Claim 41 recites in part "wherein the connection is an infrared receiver". Claim 42 recites "wherein the apparatus omits any lens for receiving light representing an image to be recorded". As noted above, the Examiner argues that the apparatus omits any lens for receiving light to be recorded "when receiving data from the camera 110". The Examiner mixes up the apparatus in the rejection between the facsimile machine 140 and the camera assembly 110. The inconsistency in the Examiner's arguments establishes that the rejections cannot be supported.

Claim 44 is an independent apparatus claim and recites in part:

> "a connection mounted in a wall in the housing for receiving JPEG data from a camera storage element;
>
> "memory for storing signals representing an image;
>
> "an interface jack between the housing and a communications line for transmitting signals from and receiving signals in the housing representing images . . . ."

None of the cited references taken singly or in combination teach or suggest the claimed combination, the recited elements quoted above, or "a connection mounted in a wall in the housing for receiving JPEG data from a camera storage element" together with "an interface jack between the housing and a communications line for transmitting signals from and receiving signals in the housing representing images". The Examiner asserts that *Hassan* elements 130 and 131 in FIG. 1 are at the same time both the connection mounted in a wall in a housing for receiving JPEG data from a camera storage element and also an interface jack between the housing and the communications line for transmitting signals from and receiving signals in the housing representing images. The Examiner has not established how 130 and 131 can be both the connection and the interface jack, and the Examiner has not established how

elements 130 and 131 both send and receive signals in the housing representing images.

Claim 45 is an independent apparatus claim and recites in part:

> "paper storage including a paper cartridge received within the housing for supplying paper;
>
> "a color printer for retrieving a sheet of paper from the paper cartridge and printing a color image on the paper, wherein the printer is sized to accept paper the larger than six inches wide . . . ."

None of the cited references taken singly or in combination teach or suggest the claimed combination, the recited elements quoted above, "a color printer for retrieving a sheet of paper from the paper cartridge" or "wherein the printer is sized to accept paper the larger than six inches wide". The Examiner only notes a color fax modem in *Hassan*, but does not establish any prior art teaching or suggesting a color printer, and the Examiner fails to identify any reference teaching a printer sized to accept paper larger than six inches wide.

The claims 46-48 are dependent directly or indirectly from independent claim 45 and are asserted as being patentable for the same reasons as discussed above with respect to claim 45, for the additional combinations in the dependent claims as well as for the additional limitations recited in the dependent claims.

Claim 49 is an independent apparatus claim and recites in part:

> "a connection adjacent the housing for receiving JPEG data from a camera storage element;
>
> "an indicator on the housing for indicating that digital images are stored and ready for printing; and
>
> "means for controlling the indicator to produce light."

None of the cited references taken singly or in combination teach or suggest the claimed combination, the recited elements quoted above, or "a connection adjacent the

housing for receiving JPEG data from a camera storage element". None of the references taken singly or in combination teach or suggest the claimed combination.

The claims 50-65 are dependent directly or indirectly from independent claim 49 and are asserted as being patentable for the same reasons as discussed above with respect to claim 49, for the additional combinations in the dependent claims as well as for the additional limitations recited in the dependent claims. Note claim 50 reciting in part "wherein the indicator is on the print button". Note also claim 52 reciting "further comprising an interface between the housing and a communications line for transmitting signals from and receiving signals in the housing representing images". Claim 56 recites in part "further including means for receiving and sending digital image files". The Examiner has made no showing of the means, the structures or the functions and how the prior art teaches or suggests them. Additionally, claim 59 recites in part "wherein the connection for receiving JPEG data is configured so that the JPEG data can be received from outside the housing". The Examiner makes no showing about what in the prior art meets the recited structure. Claims 60 recites "wherein the connection is mounted in a wall in the housing". Claim 61 recites "wherein the connection is adapted for receiving a camera memory module". Claim 62 recites "further comprising an interface between the housing and a communications line for transmitting from and receiving into the housing fax communication signals representing images". Claim 63 recites "wherein the connection is adapted for receiving a cable from a digital camera". Claim 64 recites in part "wherein the connection is an infrared receiver". Additionally, claim 65 recites "wherein the apparatus omits any lens for receiving light representing an image to be recorded".

Claim 66 is an independent apparatus claim and recites in part:

> "a connection mounted in a wall in the housing for receiving JPEG data from a camera storage element, wherein the connection for receiving JPEG data is configured so that the JPEG data can be received from outside the housing, and wherein the connection is adapted for receiving a camera memory module."

None of the cited references taken singly or in combination teach or suggest the claimed combination, the recited elements quoted above, or "a connection mounted in a wall in the housing for receiving JPEG data from a camera storage element, wherein the connection for receiving JPEG data is configured so that the JPEG data can be received from outside the housing, and wherein the connection is adapted for receiving a camera memory module". Clearly, claim 66 is patentable over the cited references.

The claims 67-81 are dependent directly or indirectly from independent claim 66 and are asserted as being patentable for the same reasons as discussed above with respect to claim 66, for the additional combinations in the dependent claims as well as for the additional limitations recited in the dependent claims. Note in particular claim 68 reciting in part "further comprising an interface between the housing and a communications line for transmitting signals from and receiving signals in the housing representing images". Note also claim 75 reciting in part "further including means for controlling the indicator to produce flashing light". Claim 76 recites in part "further comprising means for printing an image on the medium and a print button for causing printing means to print on the medium and wherein the indicator is on the print button". Claim 77 recites in part "further comprising an interface between the housing and a communications line for transmitting from and receiving into the housing fax communication signals representing images". Claim 79 recites "wherein the connection is adapted for receiving a cable from a digital camera". Claim 80 recites "wherein the connection is an infrared receiver". Claim 81 recites "wherein the apparatus omits any lens for receiving light representing an image to be recorded".

Reconsideration of the application and claims in view of the foregoing amendments and remarks is respectfully requested. Early notice of allowance thereof is earnestly solicited.

If a petition is required in conjunction with this paper, please consider this a request for such a petition.

Respectfully submitted,

Dated: January 16, 2007

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